

EXHIBIT B

Subject: Civitano v Pamrob - Rule 26 Disclosures, Request for Documents, Interrogatories
From: cbennette1@verizon.net (cbennette1@verizon.net)
To: kberg@gouldberglaw.com;
Date: Monday, August 27, 2018 4:31 PM

Kim,

Please see attached.

Hope you're enjoying your vacation (if indeed you are on one).

Clif

Attachments

- Document Demands & Interrogatory Civitano).docx (30.91KB)
- INTERrogatory (of P, 1st Set).docx (26.63KB)
- DISClosures (of P, per FRCP Rule 26, Exh 1).docx (21.85KB)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
DIANE CIVITANO,

Plaintiff,

17 Civ. 10056 (CS)(PED)

-against-

**PLAINTIFF'S DISCLOSURES
PURSUANT TO FRCP RULE 26**

PAMROB, INC. and as an individual
PAMELA HOCHSTIN,

Defendants.

-----X

Plaintiff DIANE CIVITANO, by her attorney Clif Bennette, for her Rule 26 Disclosures

state:

A. Pursuant to Rule 26(a)(1)(A)(i), Plaintiff provides the name, and if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support her claims, unless solely for impeachment, identifying the subjects of the information:

1. Defendant	All allegations in Complaint
2. Diane Civitano c/o Clif Bennette, Esq.	All allegations in Complaint
3. Laurie Barone c/o Kim Berg, Esq.	Facts pertinent to Plaintiff's job duties and claims in complaint
4. Robin Mizrahi c/o Ronald Friedman, Esq.	All allegations in Complaint and Defendants' defenses

5. Nat Wasserstein NS Wasserstein & Associates, PLLC 50 Main Street White Plains, New York	Facts pertinent to Plaintiff's job duties, business restructuring, and defenses to claims in complaint
6. Laura Huddelston 9 Leroy Place Park Ridge, NJ	Facts pertinent to Plaintiff's job duties and defenses to claims in complaint
7. Stacey Hochstin c/o Kim Berg, Esq.	Facts pertinent to Plaintiff's job duties and defenses to claims in complaint
8. Taylor Hochstin c/o Kim Berg, Esq.	Facts pertinent to Plaintiff's job duties and defenses to claims in complaint
9. Ellen Greenburgh Scarsdale, NY	Facts pertinent to Plaintiff's job duties and defenses to claims in complaint
10. Michael Tannenholtz, CPA 250 W. 54 th Street, #703 New York, NY	Facts pertinent to Plaintiff's rate of pay and salary deductions
11. Rayan Persaud 86-22 102 nd Avenue Ozone Park, NY	Facts pertinent to Plaintiff's job duties and defenses to claims in complaint
12. Nataly Goldstein 2 Brookside Way Rye Brook, NY 10573	Facts pertinent to Plaintiff's job duties and defenses to claims in complaint

B. Pursuant to FRCP 26(a)(1)(A)(ii), Plaintiff will utilize documents she provided to Defendant during mediation (emails and telephone records) which have not been reproduced with this Disclosure since they are already in Defendants' possession.

C. Pursuant to FRCP 26(a)(1)(A)(iii), Plaintiff states:

Principal Amounts \$41,655

(\$13,569 in unpaid overtime under NYLL;
\$28,086 in unpaid straight wages under NYLL)

Liquidated Damages \$10,414

(\$3,392 reflects 25% of unpaid overtime under NYLL and
\$7,021 reflects 25% of unpaid straight wages under NYLL)

TOTAL (as of October 4, 2017) \$52,068

D. Pursuant to FRCP 26(a)(1)(A)(iv), Plaintiff states that this portion of the rule is
inapplicable.

Dated: August 27, 2018
Mt. Kisco, New York

By: _____
Clif Bennette (4750816)
Attorney for Plaintiff
25 Christopher Road
Mount Kisco, N.Y. 10549
914-346-7009